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7 Attorney for RYAN CHRISTY

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RYAN CHRISTY,

15 Defendant.
16

Case No. 3:20-mj-00122-WGC

**STIPULATION TO CONTINUE
PRELIMINARY HEARING AND
DEFENDANT'S WAIVER OF
SPEEDY TRIAL**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between NICHOLAS A.
18 TRUTANICH, United States Attorney, and PENELOPE BRADY, counsel for the United States
19 of America, and RENE L. VALLADARES, Federal Public Defender, and LAUREN D.
20 GORMAN, Assistant Federal Public Defender, counsel for RYAN CHRISTY, that the
21 Preliminary Hearing currently scheduled for Monday, December 21, 2020 at 2:00 P.M., be
22 vacated and continued to a date and time convenient to the Court, but no sooner than February
23 1, 2021.

24 This Stipulation is entered into for the following reasons:

25 1. Counsel have entered negotiations and need the additional time to resolve this
26 matter.

2. Defense counsel met with Mr. Christy to discuss the Complaint (ECF No. 1), the status of his case, and his right under Federal Rule of Criminal Procedure 5.1(c) to a preliminary hearing within a reasonable time, but no later than 21 days if not in custody.

3. Mr. Christy consents to extend the time limits in Rule 5.1(c).

4. Defense counsel seeks this additional time not for purposes of delay, but merely to allow defense counsel sufficient time to complete necessary review of discovery, consultation with Mr. Christy, and to continue plea negotiations.

5. The Defendant Mr. Christy is on bond, he is in agreement with the continuance, and agrees to waive his right to a preliminary hearing.

6. This is undersigned counsel's first request for a continuance.

DATED this 14th day of December, 2020.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

/s/ LAUREN D. GORMAN
By: _____

/s/ Penelope Brady
By: _____

LAUREN D. GORMAN
Assistant Federal Public Defender
Counsel for EDWARD MONET KNIGHT

PENELOPE BRADY
Assistant United States Attorney
Counsel for the Government

IT IS SO ORDERED.

DATED this 16th day of December, 2020.

William G. Cobb

WILLIAM G. COBB
UNITED STATES MAGISTRATE JUDGE